

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JUSTIN EVERETT,)	
)	
Plaintiff,)	
)	
v.)	
)	
FIELDWORKS, INC., LAURA)	Civil Action No. 2:17-cv-01495-PJP
BARKLEY, ZACHARY REIDER, CHRIS)	
GALLAWAY and LEWIS GRANOFSKY,)	
)	
Defendants.)	

DECLARATION OF LEWIS GRANOFSKY

I, Lewis Granofsky, hereby declare and state the following:

1. My name is Lewis Granofsky.
2. I have personal knowledge of information contained in this Declaration.
3. I am a member of FieldWorks, LLC, and serve as a Partner along with Chris Gallaway.
4. I reside in Portland, Oregon, and have resided here for approximately 12 years.
5. I work exclusively out of FieldWorks' Portland, Oregon office.
6. I did not hire Plaintiff, review his performance, or participate in any manner in the decision to terminate him.
7. Although FieldWorks had a Pittsburgh office in 2016, which closed shortly after the voter registration deadlines for the 2016 Presidential election, and operations in Philadelphia, I do not travel to Pennsylvania for personal reasons and otherwise have no non-business contacts in Pennsylvania.

I, Lewis Granofsky, declare under penalty of perjury that the foregoing is true and correct.

/s/ Lewis Granofsky

Lewis Granofsky

Dated: February 15, 2019